

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

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In the Matter of	)	
	)	
	)	
TIMOTHY R. BEAN,	)	DOCKET NO. C-3665
individually and doing business	)	
as DMC PUBLISHING GROUP	)	

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**COMPLAINT**

The Federal Trade Commission, having reason to believe that Timothy R. Bean, individually and doing business as DMC Publishing Group ("respondent"), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

**PARAGRAPH ONE:** Respondent Timothy R. Bean is an individual doing business as DMC Publishing Group. His principal office or place of business is located at 26052 Merit Circle, Suite 107, Laguna Hills, California 92653.

**PARAGRAPH TWO:** Respondent is engaged in the advertising, promotion, offering for sale, sale, and distribution of a program to operate a publishing and printing business at home to the public.

**PARAGRAPH THREE:** The acts and practices of respondent alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

**PARAGRAPH FOUR:** Respondent has disseminated or has caused to be disseminated advertisements, including advertisements through the Internet, for his program to operate a publishing and printing business at home. These advertisements include, but are not necessarily limited to, the attached Exhibits 1 and 2, which state, in part:

- A. "Profit From Publishing and Print Brokerage At Home! Earn up to \$4,000 or More Each Month!" (Exhibit 1.)
- B. "Earn \$500 -\$5000 or More Each Month" (Exhibit 1.)

- C. “[The] ‘Quick Phone Directory’ ... publication alone can earn you \$4,000 or more in the first 30 days.” (Exhibit 2.)
- D. “Our HOME WORKERS FIRST YEAR INCOME averages \$38,000 with 40-50% annual growth. Most are EARNING WELL OVER \$75,000 by their third year.” (Exhibit 2.)

**PARAGRAPH FIVE:** Through the use of the statements contained in the advertisements referred to in PARAGRAPH FOUR, including, but not necessarily limited to the advertisements attached as Exhibits 1 and 2, respondent has represented, directly or by implication, that the amount of the money represented by these statements is representative, or typical, of what individuals who purchase respondent’s program will generally achieve.

**PARAGRAPH SIX:** In truth and in fact, the amount of money represented by these statements is not representative, or typical, of what individuals who purchase respondent’s program will generally achieve. Therefore, the representation set forth in PARAGRAPH FIVE was, and is, false and misleading.

**PARAGRAPH SEVEN:** Through the use of the statements contained in the advertisements referred to in PARAGRAPH FOUR, including but not necessarily limited to the advertisements attached as Exhibits 1 and 2, respondent has represented, directly or by implication, that at the time he made the representation set forth in PARAGRAPH FIVE, respondent possessed and relied upon a reasonable basis that substantiated such representation.

**PARAGRAPH EIGHT:** In truth and in fact, at the time he made the representation set forth in PARAGRAPH FIVE, respondent did not possess and rely upon a reasonable basis that substantiated such representation. Therefore, the representation set forth in PARAGRAPH SEVEN was, and is, false and misleading.

**PARAGRAPH NINE:** The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this 10th day of June, 1996, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

**SEAL:**